

**EXHIBIT  
H**

## ORAL AND VIDEOTAPED DEPOSITION OF ASHLEY RUISE

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION  
C.M. COLLINS, N.J. LUNDY, §  
and R.C.L. MAYES, §  
Individually and on behalf §  
of all other similarly §  
situated, §

§  
§  
Plaintiffs, §

VS. § NO. 4:22-cv-1073

§  
CATASTROPHE RESPONSE UNIT, §  
INC. and CATASTROPHE §  
RESPONSE UNIT USA, INC., §  
§  
Defendants. §

ORAL AND VIDEOTAPED DEPOSITION OF  
ASHLEY RUISE  
OCTOBER 12, 2023  
VOLUME 1  
(Reported Remotely)

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## A P P E A R A N C E S

## FOR THE PLAINTIFFS:

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FOR THE DEFENDANTS, CATASTROPHE RESPONSE UNIT,  
INC. AND CATASTROPHE RESPONSE UNIT USA, INC.:

Mr. Monte K. Hurst  
Ms. Kristen A. Laster  
HALLETT & PERRIN, P.C.  
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## ALSO PRESENT:

Ms. Ciecili Morales  
Mr. David Repinski  
Mr. Adam Dickens  
Mr. Adam Coates, Videographer

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ORAL AND VIDEOTAPED DEPOSITION of ASHLEY  
RUISE, produced as a witness at the instance of the  
Defendants, and duly sworn, was taken in the  
above-styled and numbered cause on the 12th of  
October, 2023, from 9:32 a.m. to 6:15 p.m., before  
Kathy E. Weldon, CSR in and for the State of Texas,  
reported by machine shorthand, at the residence of  
Ashley Ruise, 1924 SW 4th Street, in the City of Fort  
Lauderdale, County of Broward, State of Florida,  
pursuant to Notice and the Federal Rules of Civil  
Procedure.

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1 contractor. And you understand what it means to be an  
2 independent contractor, correct?

3 **A. Yes.**

4 MR. GASPER: Objection, form.

5 Q. (By Mr. Hurst) Okay. Do you like being an  
6 independent contractor?

7 MR. GASPER: Same objection.

8 **A. Yes, I do.**

9 Q. (By Mr. Hurst) Why do you like being an  
10 independent contractor?

11 **A. Because it's very lucrative. You get what  
12 you -- well, yeah, I just felt like it's -- it's  
13 lucrative. But an independent contractor, I felt like  
14 based on the ask and the task of the work, sometimes  
15 they pay you what you are worth.**

16 Q. Each time you were deployed by CRU, you  
17 understood that you would be performing work as an  
18 independent contractor, correct?

19 MR. GASPER: Objection, form.

20 **A. Yes.**

21 Q. (By Mr. Hurst) Each time you were deployed by  
22 CRU, you understood that CRU would pay you for your  
23 services and would, at the end of the year, issue a  
24 form 1099, correct?

25 **A. Yes, sir.**

1 Q. You would then use that form 1099 to file  
2 your taxes with the U.S. Internal Revenue Service,  
3 correct?

4 **A. Yes, sir.**

5 Q. Each time you were deployed by CRU, you  
6 understood that CRU would not be withholding taxes  
7 from your compensation, correct?

8 **A. Yes, sir.**

9 Q. Each time you were deployed by CRU, you  
10 understood that you would be responsible for all tax  
11 obligations arising from your performance of services  
12 for CRU?

13 **A. Yes, sir.**

14 Q. Did you ever claim any business expenses on  
15 your taxes for the years in which you performed  
16 services for CRU?

17 **A. No, sir, I didn't.**

18 Q. You never have?

19 **A. I didn't file taxes for -- you say for what?  
20 Say again? Have I ever --**

21 Q. Well --

22 **A. For what year?**

23 Q. May- -- maybe you're on to something here.

24 Did you file a tax return for 2021?

25 **A. No, I didn't.**

1 Q. Did you file a tax return for 2022?

2 **A. No, sir.**

3 Q. May I ask you why you didn't file a tax  
4 return for 2021 or 2022?

5 **A. Yes, sir. At that -- at that point in time,  
6 I was -- I was dealing with a lot. The paperwork that  
7 my -- at the time, I had my mail coming to my mom's  
8 address. And she gathered up all my mail for me, but  
9 at the time, she -- you know how parents are? They --  
10 they -- they -- they put things up, and they misplace  
11 it, and forget where they put it at. And so it was  
12 more of that. I couldn't find my forms that they did  
13 had sent out to me.**

14 **And by the time that I did find them was  
15 literally when my mom gave me everything and said,  
16 Ashley, I have all of your stuff. It was this year  
17 that -- after taxes of this year. So I did promise --  
18 I -- I did reach out to my tax lady and told her I  
19 know I haven't filed for these past two years, and I  
20 will be filing this upcoming year coming.**

21 **So it was, like, a -- moving around, I  
22 didn't have a steady place or anything like that. So  
23 my mail was moved around as well. So it was me  
24 trying --**

25 Q. Okay.

1 **A. -- to get all of my documents in order.**

2 Q. So -- so your testimony is that you intend to  
3 file your tax returns for 2021 and 2022 shortly?

4 **A. Well, the year coming up, yes, sir. For  
5 2024, yes.**

6 Q. 2023?

7 **A. 2023, yes, sir, the year coming up.**

8 Q. I understand you intend to file those, but  
9 are you going to be filing your 2021 or 2022 taxes?

10 **A. Yes, sir. All of that together.**

11 Q. When will you be doing that, sometime at the  
12 beginning of 2024?

13 **A. Yes, sir.**

14 Q. Who's your tax --

15 **A. This summer.**

16 Q. Who's your tax personal representative?

17 **A. Her name is Shell Owens.**

18 Q. S-H-E-L-L O-W-E-N-S?

19 **A. Yes. But we call her Shell. I can't  
20 pronounce -- I can't -- I've called her Shell for so  
21 long, that's what I know her by, her name. I can't  
22 really put -- give you her exact real name. Her name  
23 is Shell. But I can give you that information if  
24 needed.**

25 Q. When was the last time you filed a tax

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I, ASHLEY RUISE, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

\_\_\_\_\_  
ASHLEY RUISE

THE STATE OF \_\_\_\_\_)  
COUNTY OF \_\_\_\_\_)

Before me, \_\_\_\_\_, on this day personally appeared ASHLEY RUISE, known to me (or proved to me under oath or through \_\_\_\_\_) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
NOTARY PUBLIC in AND FOR  
THE STATE OF \_\_\_\_\_

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STATE OF TEXAS )  
COUNTY OF DALLAS )

I, Kathy E. Weldon, Certified Shorthand Reporter, in and for the State of Texas, certify that the foregoing deposition of ASHLEY RUISE was reported stenographically by me at the time and place indicated, said witness having been placed under oath by me, and that the deposition is a true record of the testimony given by the witness.

I further certify that I am neither counsel for nor related to any party in this cause and am not financially interested in its outcome.

Given under my hand on this the \_\_\_\_\_ day of \_\_\_\_\_, 2023.

*Kathy E. Weldon*

Kathy E. Weldon, CSR No. 6166  
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My Commission Expires 10-31-2025

Time used by each party:  
Mr. Travis Gasper - 0:00  
Mr. Monte K. Hurst - 6:43